

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DEBORAH FRAME-WILSON, *et al.*, on behalf  
of themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:20-cv-00424-JHC

STIPULATED MOTION AND  
ORDER REGARDING DISCOVERY  
SCHEDULE

ELIZABETH DE COSTER, *et al.*, on behalf of  
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:21-cv-00693-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:22-cv-00965-JHC

The parties, by and through their counsel, have agreed and stipulated as follows:

1. The Court ordered that “the discovery deadline in the three above-captioned cases” be aligned “with the discovery deadlines in cases brought by governmental plaintiffs—*California v. Amazon.com, Inc.*, No. CGC-22-601826 (Cal. Super. Ct.) (CA AG) and *FTC v. Amazon.com, Inc.*, No. 2:23-cv-01495-JHC (W.D. Wash.) (FTC).” *See Frame-Wilson* Dkt. No. 172.
2. The Court’s order identified the close of discovery as August 8, 2025. *Id.* In the FTC case, however, the Court subsequently extended the fact discovery deadline to October 22, 2025. Consistent with the Court’s intent, the parties agree that the deadline for fact discovery in the above-captioned cases is also October 22, 2025.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their undersigned counsel of record, and the parties ask the Court to order that:

1. The deadline for fact discovery in the above-captioned cases is October 22, 2025.

DATED July 22, 2025.

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Steve W. Berman

Steve W. Berman (WSBA No. 12536)

By: /s/ Barbara A. Mahoney

Barbara A. Mahoney (WSBA No. 31845)

1301 Second Avenue, Suite 2000

Seattle, WA 98101

Telephone: (206) 623-7292

Facsimile: (206) 623-0594

E-mail: [steve@hbsslaw.com](mailto:steve@hbsslaw.com)

[barbaram@hbsslaw.com](mailto:barbaram@hbsslaw.com)

Anne F. Johnson (*pro hac vice*)

594 Dean Street, Suite 24

Brooklyn, NY 11238

Telephone: (718) 916-3520

E-mail: [annej@hbsslaw.com](mailto:annej@hbsslaw.com)

KELLER POSTMAN LLC

Zina G. Bash (*pro hac vice*)  
111 Congress Avenue, Suite 500  
Austin, TX, 78701  
Telephone: (512) 690-0990  
E-mail: zina.bash@kellerpostman.com

Jessica Beringer (*pro hac vice*)  
Alex Dravillas (*pro hac vice*)  
Shane Kelly (*pro hac vice*)  
150 North Riverside Plaza, Suite 4100  
Chicago, Illinois 60606  
Telephone: (312) 741-5220  
E-mail: Jessica.Beringer@kellerpostman.com  
E-mail: ajd@kellerpostman.com  
E-mail: shane.kelly@kellerpostman.com

*Interim Co-Lead Counsel for Plaintiffs and the  
proposed Class*

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By: /s/ Alicia Cobb  
Alicia Cobb, WSBA # 48685  
1109 First Avenue, Suite 210  
Seattle, WA 98101  
Telephone: (206) 905-7000  
Email: aliciacobb@quinnemanuel.com

Steig D. Olson (*pro hac vice*)  
David D. LeRay (*pro hac vice*)  
Nic V. Siebert (*pro hac vice*)  
Maxwell P. Deabler-Meadows (*pro hac vice*)  
Elle Mahdavi (*pro hac vice*)  
295 Fifth Ave.  
New York, NY 10016  
Telephone: (212) 849-7000  
Email: steigolson@quinnemanuel.com  
Email: davidleray@quinnemanuel.com  
Email: nicolassiebert@quinnemanuel.com  
Email: maxmeadows@quinnemanuel.com  
Email: ellemahdavi@quinnemanuel.com

Adam B. Wolfson (*pro hac vice*)  
865 South Figueroa Street, 10th Floor  
Los Angeles, CA 90017-2543  
Telephone: (213) 443-3000  
Email: adamwolfson@quinnemanuel.com

*Interim Executive Committee for Plaintiffs and the  
proposed Class*

DAVIS WRIGHT TREMAINE LLP

By /s/ John A. Goldmark  
John A. Goldmark, WSBA # 40980  
MaryAnn Almeida, WSBA #49086  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
Telephone: (206) 622-3150  
Email: johngoldmark@dwt.com  
Email: maryannalmeida@dwt.com

DUNN ISAACSON RHEE LLP

Karen L. Dunn (*pro hac vice*)  
William A. Isaacson (*pro hac vice*)  
Amy J. Mauser (*pro hac vice*)  
Kyle Smith (*pro hac vice*)  
401 Ninth Street, NW  
Washington, DC 20004-2637  
Telephone: (202) 240-2900  
E-mail: kdunn@dirllp.com  
E-mail: wisaacson@dirllp.com  
E-mail: amauser@dirllp.com  
E-mail: ksmith@dirllp.com

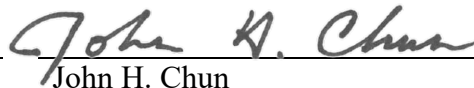
Meredith Dearborn (*pro hac vice*)  
345 California Street  
Suite 600  
San Francisco, CA 94104-2671  
Telephone: (202) 240-2900  
E-mail: mdearborn@dirllp.com

*Attorneys for Amazon.com, Inc.*

1 IT IS SO ORDERED.

2  
3 July 22, 2025

4 Dated



John H. Chun

United States District Judge